

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FRANK HAGLER

Plaintiff

VS.

JURY TRIAL DEMANDED
HONORABLE RICHARD CAPUTO

SOUTHWESTERN ENERGY
PRODUCTION COMPANY a/k/a, d/b/a.
t/a, t/d/b/a SOUTHWESTERN ENERGY
a/k/a, d/b/a, t/a, t/d/b/a SEECO, INC.; and,
a/k/a, d/b/a, t/a, t/d/b/a SEPCO

NO: 3:12-CV-01692-ARC

(Electronically Filed)

Defendants

ANSWER TO AMENDED COMPLAINT

Defendant, Answers Plaintiff's Amended Complaint as follows:

1. The averments contained in Paragraph 3 are admitted in part and denied in part. It is admitted that the proper Defendant is Southwestern Energy Production Company (SEPCO) which is an Arkansas Corporation with a principal office at 2350 North Sam Houston Parkway East, Houston, Texas 77032. SEECO, Inc. operates solely in Arkansas and has no relationship with the subject suit.

2. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraphs 1, 2, 4 and 6.

3. Defendant denies each and every allegation contained in Paragraphs 7, 8, 9, 10, 11, 12, 13 and 14.

4. With respect to the allegations contained in Paragraph 5, Defendant incorporates its answers to the paragraphs to which reference is made therein as fully as though the same were set forth at length.

AFFIRMATIVE DEFENSES

1. Plaintiff assumed the risk of injury.
2. Plaintiff was contributorily negligent.
3. Plaintiff's injuries may have been caused by a fellow servant.

WHEREFORE, Defendant asks that this cause of action be dismissed and judgment entered in its favor.

Respectfully submitted,

Marshall, Dennehey, Warner,
Coleman & Goggin

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